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    UNITED STATES OF AMERICA
10
                          UNITED STATES DISTRICT COURT
11
                     FOR THE CENTRAL DISTRICT OF CALIFORNIA
12
    UNITED STATES OF AMERICA,
                                          No. CR 18-625-JAK
13
              Plaintiff,
                                          JOINT DISCOVERY REPORT
14
                    v.
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    SCOTT SEO, and
    WILBUR M. SALAO,
16
              Defendants.
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19
         Plaintiff, United States of America, by and through its counsel
20
    of record, the United States Attorney for the Central District of
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    California, and defendants SCOTT SEO and WILBUR M. SALAO, by and
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1	through	their re	espe	ctive counse	l of record as indicated below, hereby
2	submit	the attac	ched	joint disco	very report.
3	Dated:	October	29,	2018	Respectfully submitted,
4					NICOLA T. HANNA United States Attorney
5					LAWRENCE S. MIDDLETON
6 7					Assistant United States Attorney Chief, Criminal Division
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9					/s/ VERONICA DRAGALIN Assistant United States Attorney
10					Attorneys for Plaintiff UNITED STATES OF AMERICA
11	Dated:	October	30,	2018	
12					/s/ via e-mail authorization STANLEY L. FRIEDMAN
13 14					Attorney for Defendant SCOTT SEO
15	Dated:	October	29,	2018	
16					/s/ via e-mail authorization ANTHONY M. SOLIS
17					Attorney for Defendant
18					WILBUR M. SALAO
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DISCOVERY REPORT

Defendants SCOTT SEO ("SEO") and WILBUR M. SALAO ("SALAO") have been charged with one count of conspiracy, in violation of 18 U.S.C. § 371, four counts of honest services mail fraud, in violation of 18 U.S.C. §§ 1346, 1341, four counts of honest services wire fraud, in violation of 18 U.S.C. §§ 1346, 1343, and defendant SEO has been additionally charged with four counts of bribery concerning programs receiving federal funds, in violation of 18 U.S.C. § 666(a)(2). These charges arise out of an ongoing scheme whereby defendant SEO allegedly paid bribes and kickbacks to defendant SALAO, and defendant SALAO, in turn, took official acts to benefit defendant SEO financially.

Status of Discovery

To date, the government has produced over 5,700 pages of discovery to defendants, as well as numerous audio and video recordings and other native files. A significant portion of the discovery is subject to a stipulated Protective Order filed by the parties in this case. In addition, the government has offered to make available dozens of additional audio recordings in the case, as well as more than 3,000 pages of confidential documents obtained from the California Department of Alcoholic Beverage Control. The government is aware of its ongoing discovery obligations and will continue to comply with them. Disputes

At this time, there are no discovery disputes.

Anticipated Motions

At this time, the government expects to file motions in limine in advance of trial. At this time, defendants have not had an opportunity to assess whether any pretrial motions will be filed.

The parties may decide to file other motions as the trial date approaches, and will adhere to the Court's deadlines.

Expected Trial Date

The parties do not expect to proceed on the current trial date of December 11, 2018, in light of the complexity of the case and the amount of discovery, and expect to file a stipulation and proposed order requesting a continuance of the trial date, if a resolution by plea agreement is not reached in advance of the current trial date.

Anticipated Length of Trial

The government estimates five trial days for its case in chief.